



FACT SHEET

Cirtec Medical, Lowell Air Quality non-Major Comprehensive Plan Application and Cumulative Impact Analysis

Introduction

Cirtec Medical (Cirtec) plans to file an Air Quality non-Major Comprehensive Plan Application (CPA) for an air permit with the Massachusetts Department of Environmental Protection (MassDEP) for its existing facility located at 1001 Pawtucket Boulevard, Suite 260 in Lowell, Massachusetts (the Facility). The Facility is subject to the Massachusetts Air Pollution Control Regulations (310 CMR 7.00) and Cirtec is required to obtain an air permit. MassDEP conducted an inspection of the Facility during which it was determined the Facility is required to obtain an air permit due to the Facility's emittance of volatile organic compound (VOC) emissions greater than the ten tons per year. In addition, Cirtec is required by 310 CMR 7.02(14) to conduct a Cumulative Impact Analysis (CIA) prior to filing an application for an air permit with MassDEP to ensure that the project does not result in any adverse or disproportionate impacts to neighboring communities, including Environmental Justice (EJ) communities and any other interested parties. The CIA includes enhanced public outreach and involvement of nearby EJ populations and other interested parties, assessment of existing community conditions, and analysis of cumulative impacts of the proposed project. Comments Cirtec encourages members of the public who are interested in learning more about the proposed project, providing input to the CIA that is being conducted, or who wish to be added to a distribution list that will be used to keep community members informed, to contact the project point of contact via the information at the bottom of this Fact Sheet.

Cirtec will include a CIA summary report with the CPA submittal to MassDEP. At that time Cirtec will notify members of the public how they can review the CPA and CIA and how to submit questions or informal comments to Cirtec and MassDEP during the MassDEP CPA and CIA review period. After completing its review and the incorporation of informal CIA comments, MassDEP will issue a proposed decision to approve or deny the CPA, and at that time will provide a formal 60-day public comment period on the proposed decision.

Facility Information

The Facility began its operations at the current location in 2014 and specializes in the design and manufacturing of advanced microelectronic, thin-film circuits, and electroformed componentry for implantable medical devices. The Facility contributes important products to the state-of-the-art medical device market and currently employs 260 community members. The primary emissions associated with the Facility are volatile organic compounds (VOCs) which are emitted from various stages of the manufacturing process. VOCs are gases emitted from everyday solids and liquids, found in paints, cleaning supplies, furnishings, etc. These emissions are vented through exhaust points located on the roof of the Facility. The Facility is located adjacent to the northern edge of the Merrimack river along Route 113 (Pawtucket Boulevard). The Facility does not currently have an existing MassDEP air quality plan approval

or air permit.

Project Information

The Facility is not adding new emissions sources or expanding operations which will result in an increase in air emissions as part of this project. The proposed project is being undertaken as result of MassDEP's issuance of an Administrative Consent Order with Penalty (ACOP).

VOC process emissions from the Facility result from various stages of the manufacturing process which includes etching, curing, coating, and solvent based cleaning. None of the VOC emissions are classified as hazardous air pollutants (HAPs). The project's annual maximum potential to emit (PTE) VOC emissions in tons per year (tpy), are provided in Table 1. Actual VOC emissions will be lower.

Table 1 – Estimated Process PTE (tpy)

VOC
25.5

The Facility also has a diesel-fired 350-kilowatt emergency backup generator which operates during power outage events and twenty minutes a week for test cycling. The generator will emit products of combustion, including particulate matter less than 10 microns (PM₁₀), particulate matter less than 2.5 microns (PM_{2.5}), sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), volatile organic compounds (VOC), and hazardous air pollutants (HAPs).

Table 2 – Estimated Emergency Generator PTE (tpy)

PM ₁₀	PM _{2.5}	SO ₂	NO _x	CO	VOC	HAPs
0.026	0.026	0.004	1.197	0.353	0.003	0.0032

As required under state regulation, the Facility will utilize Best Available Control Technology (BACT) to reduce emissions as applicable. The proposed equipment is not subject to any federal air permitting requirements or other air requirements. The project does not meet any thresholds for review under the Massachusetts Environmental Policy Act (MEPA).

Environmental Justice Populations

The Facility is located in an Environmental Justice (EJ) community, and there are nine other EJ Block Groups within one mile of the proposed project as shown in Figure 1 using MassDEP's CIA Mapping tool. Nine EJ Block Groups are based on minority criteria (yellow), one is based on minority and income criteria (green). The minority criteria and income criteria are as follows:

- **Minority:** the block group minority population is $\geq 40\%$, or the block group minority population is $\geq 25\%$ and the median household income of the municipality the block group is in is $< 150\%$ of the Massachusetts median household income
- **Income:** at least 25% of households have a median household income 65% or less than the state median household income

The proposed project is specifically located in Block Group 1, Census Tract 3106.01 (GEOID: 250173106011 on Figure 1).

Cirtec will broadly engage our neighboring communities and interested parties, including the EJ communities in Chelmsford, to provide information about the proposed project. Cirtec will provide this fact sheet with an invitation to a public meeting and post information publicly at key locations including the local library and City Hall. Cirtec will also request to place this information on the City's Community Events calendar. Cirtec will solicit guidance from community members for other locations to post information on the project (local stores, churches, community centers, etc) and the meeting invitation will be provided to additional individuals based on the outreach list provided by MassDEP as well as to everyone that provides comments on the project.

Cumulative Impact Analysis Information

Questions about MassDEP's role in the CIA process can be directed to Joanne Morin, Deputy Director, Bureau of Air and Waste, at Joanne.O.Morin@mass.gov.

For the MassDEP CIA Mapping Tool and data go to the website: <https://mas.gov/info-details/cumulative-impact-analysis-in-air-quality-permitting>.

Applicant Contact Information

Questions regarding this project can be directed to:

Contact Person: James Ryan

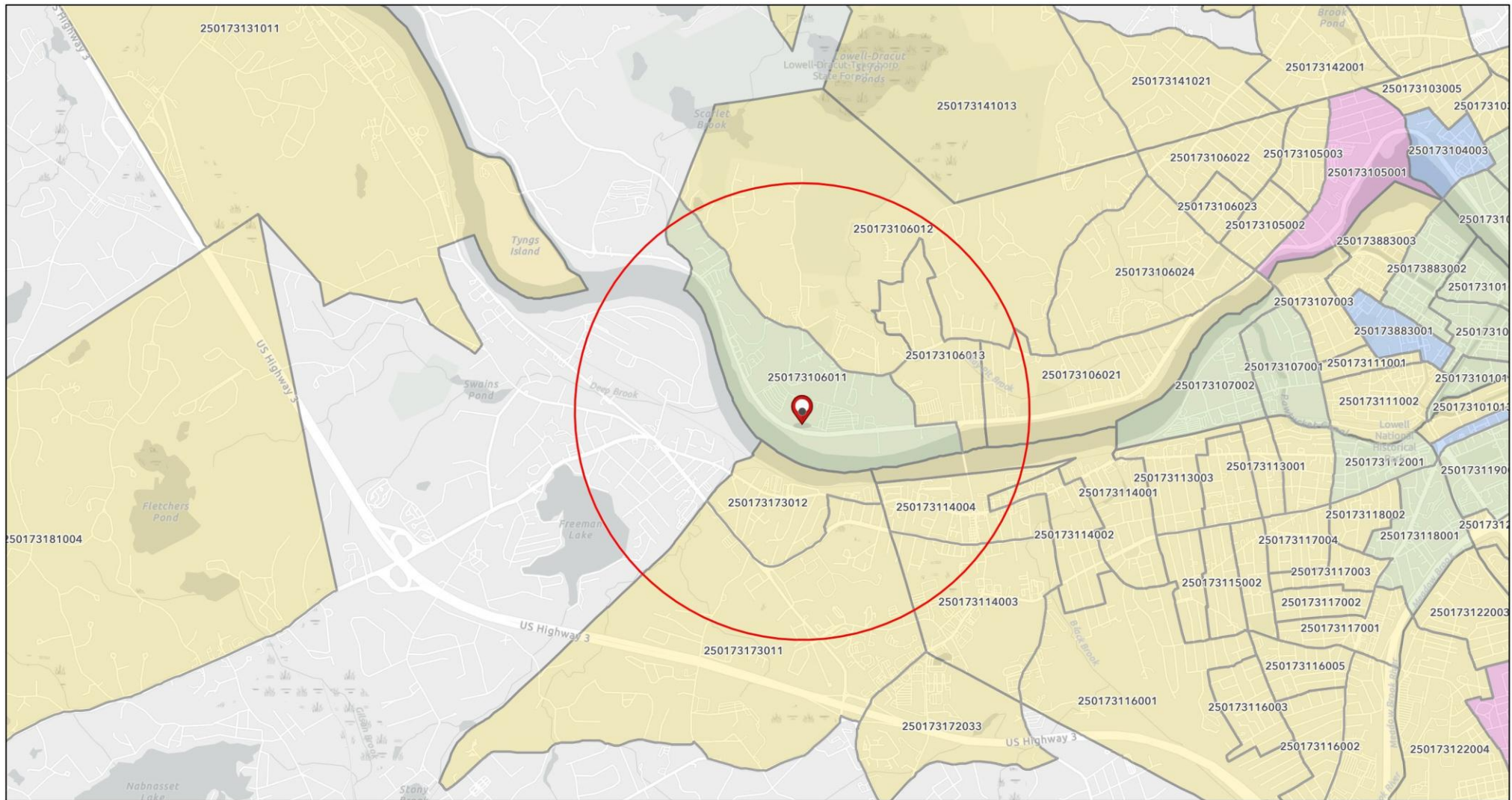
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This fact sheet is available in alternative formats, including translation into other non-English languages, upon request. To request an accommodation please contact James Ryan at jtryan@trccompanies.com and use the subject FACT SHEET.

Figure 1 - Census Tracts and EJ Block Groups within 1 mile of the Project Site



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MA 2020 Environmental Justice Block Groups Nov2022 Update

Minority: the block group minority population is >= 40%, or the block group minority population is >= 25% and the median household income of the municipality the block group is in is < 150% of the Massachusetts median household income

Minority and Income

Minority and English isolation

Minority, Income and English isolation

1:36,112

0 0.33 0.65 1.3mi

0 0.5 2km

Sources: Esri, TomTom, Garmin, FAQ, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community